

LAW OFFICES OF JILL R. SHELOW PLLC

**MEMO ENDORSED**

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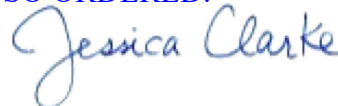
Application GRANTED. The defense pretrial motions deadlines are EXTENDED as followed: Defendant's motion(s), if any, shall be by August 16, 2024, Government's responses shall be filed by August 30, 2024. Defendant's reply shall be filed by September 6, 2024. The Clerk of Court is respectfully directed to terminate the letter motion at ECF No. 30.

July 11, 2024

**BY ECF AND EMAIL**

The Honorable Lewis J. Liman  
The Honorable Jessica G.L. Clarke  
United States District Judges  
Southern District of New York  
500 Pearl Street  
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SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge

Dated: August 5, 2024  
New York, New York

**RE: *U.S. v. Cristian and Heriberto Eustate Espinal, 23 Cr. 577 (LJL)***  
***U.S. v. Cristian Eustate Espinal, 23 Cr. 619 (JGLC)***

Dear Judge Liman and Judge Clarke:

I represent Cristian Eustate Espinal in the above cases, and I am writing to request a 30 day extension of the July 15 motions deadline. The Government consents. As to the matter pending before Judge Lewis J. Liman only, John Kaley, Esq., counsel for Heriberto Eustate Espinal joins in this request.

First, this week the Government is producing another 4 TB of discovery – mostly cell phones – from another related case. This brings to three the number of related prosecutions for which discovery is being cross-produced. The Government advises that the new production is in an abundance of caution. Thus, in an abundance of caution we need to review the contents. Second, I am engaged in discussions with the Government about a pretrial disposition, and we need more time mostly because of technical problems associated with our analysis of the child pornography. Th government is not at fault. Their agents have gone out of their way to be of assistance, but due to hardware limitations, the problems have been unavoidable.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow

cc: All Counsel (by ECF)

Admitted: NY, CT, DC